

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

LEJILEX; CRYPTO FREEDOM ALLIANCE OF
TEXAS,

Plaintiffs,

v.

SECURITIES AND EXCHANGE
COMMISSION; ERIC R. WERNER; GARY
GENSLER; CAROLINE A. CRENSHAW;
JAIME E. LIZARRAGA; HESTER M. PEIRCE;
and MARK T. UYEDA, in their official
capacities,

Defendants.

C.A. No.: 4:24-cv-00168-O

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), defendants respectfully request a 28-day extension to answer or otherwise respond to the complaint.

1. Plaintiffs LEJILEX and Crypto Freedom Alliance of Texas filed the complaint on February 21, 2024.

2. Defendants are the Securities and Exchange Commission, its five Commissioners, and the Regional Director of its Fort Worth Regional Office. Defendants' current deadline to answer or otherwise respond to the complaint is April 26, 2024.

3. Defendants request a 28-day extension to answer or otherwise respond to the complaint. Defendants require this additional time to complete the process of drafting and filing

their answer or other response to the complaint. Furthermore, additional time is requested in light of deadlines in other matters and certain counsels' unavailability in connection with the Passover holiday.

4. Should this Court grant defendants' request, the new deadline to answer or otherwise respond to the complaint would be Friday, May 24, 2024.

5. Plaintiffs do not oppose the requested extension.

Dated: April 12, 2024

Respectfully submitted,

/s/ Jason J. Rose

Jason J. Rose
Texas Bar No. 24007946
Securities and Exchange Commission
801 Cherry Street, Suite 1900
Fort Worth, Texas 76102
(817) 978-1408 (phone)
(817) 978-4927 (facsimile)
rosej@sec.gov

Jeffrey A. Berger*
Illinois Bar No. 6282511
Ezekiel L. Hill*
D.C. Bar No. 1684647
David D. Lisitza*
California Bar No. 225824
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549
(202) 551-5100 (phone)
bergerje@sec.gov
hillez@sec.gov
lisitzad@sec.gov

Counsel for Defendants

* Not admitted in N.D. Tex. Pro hac vice motions forthcoming.

CERTIFICATE OF CONFERENCE

On April 11, 2024, counsel for defendants conferred with counsel for plaintiffs, who indicated that plaintiffs are unopposed to the requested extension.

/s/ Jason J. Rose

Jason J. Rose

CERTIFICATE OF SERVICE

I affirm that on April 12, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court for the Northern District of Texas, Fort Worth Division, by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

/s/ Jason J. Rose

Jason J. Rose